Rhonda H. Wills Appearance Pro Hac Vice WILLS LAW FIRM, PLLC 1776 Yorktown, Suite 570 Houston, Texas 77056 Telephone: (713) 528-4455 Facsimile: (713) 528-2047 rwills@rwillslawfirm.com George P. Moschopoulos
The Law Office of
George Moschopoulos, APC
34197 Pacific Coast Highway,
Suite 100
Dana Point, California 92629
Telephone: (714) 904-1669
Facsimile: (949) 272-0428
georgem@logmapc.com

ATTORNEYS FOR PLAINTIFFS AND THE PUTATIVE CLASSES

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

RON HENRY, ET AL., on behalf of themselves and all others similarly situated,

Case No. 15-CV-03895-PSG-PLA

Plaintiffs,

Hon. Philip S. Gutierrez

v.

1

2

3

5

6

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

JPMORGAN CHASE & CO. and JPMORGAN CHASE BANK, N.A.,

DECLARATION OF RHONDA H.
WILLS IN SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL CLASS-WIDE
ARBITRATION OF PLAINTIFFS'
CLAIMS

Defendants.

Date: November 14, 2016

Time: 1:30 p.m. Courtroom: 880

DECLARATION OF RHONDA H. WILLS IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL CLASS-WIDE ARBITRATION OF PLAINTIFFS' CLAIMS CASE NO. 15-CV-03895-PSG-PLA

EXHIBIT

A

DECLARATION OF RHONDA H. WILLS

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the following is true and correct:

- My name is Rhonda H. Wills. I am over the age of eighteen years, 1. capable of making this declaration, and fully competent to testify to the matters stated here due to my position, experience, and personal knowledge. I have personal knowledge of the facts stated, and they are true.
 - I am lead counsel for Plaintiffs in the above-referenced matter. 2.
- 3. I have conferred with Defendants' counsel in this action, Carrie A. Gonell, regarding Plaintiffs' intent to compel class-wide arbitration of Plaintiffs' claims.
- Attached to Plaintiffs' Motion as Exhibit 2 are true and correct copies 4. of the offer letters and applicable Binding Arbitration Agreements for Plaintiffs Ron Henry, Clayton Guillory, Anita Marie Moore, Ryan Switzer, Luis Rodriguez, Joseph Sari, and Yuriy Kilgishov, which were produced by Defendants in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 14, 2016

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF RHONDA H. WILLS IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL CLASS-WIDE ARBITRATION OF PLAINTIFFS' CLAIMS CASE No. 15-CV-03895-PSG-PLA—PAGE 1